

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                                   |   |                           |
|-----------------------------------|---|---------------------------|
| PETER M. GALLIGAN,                | § |                           |
|                                   | § |                           |
| Plaintiff,                        | § |                           |
|                                   | § |                           |
| v.                                | § | Case No. 1:17-cv-6310     |
|                                   | § |                           |
| ADTALEM GLOBAL EDUCATION, INC.    | § | Hon. Judge Joan H. Lefkow |
| F/K/A DEVRY EDUCATION GROUP;      | § |                           |
| ADTALEM GLOBAL HEALTH, INC. F/K/A | § |                           |
| DEVRY MEDICAL INTERNATIONAL,      | § |                           |
| INC.; ROSS UNIVERSITY SCHOOL OF   | § |                           |
| VETERINARY MEDICINE (ST. KITSS)   | § | JURY TRIAL DEMANDED       |
| LIMITED; and DOES 1 THROUGH 50,   | § |                           |
|                                   | § |                           |
| Defendants.                       | § |                           |
|                                   | § |                           |
|                                   | § |                           |

**PARTIES' JOINT STATUS REPORT**

Pursuant to section 5 of the Northern District of Illinois' April 24, 2020, Third Amended General Order 20-0012 (In Re: Coronavirus COVID-19 Public Emergency), subsequently noticed by this Court on April 27, 2020, the parties submit the following joint status report addressing subparts (a)-(g) of the Order's Section 5:

**(a) The Progress of Discovery.**

Discovery has not commenced.

**(b) The Status of Briefing on Unresolved Motions.**

At a February 5, 2020, status hearing, this Court asked the parties to file simultaneous motions on February 19, 2020, detailing each side's position as to the best forum in which this matter should proceed [*see* Dkts. 80-82, 88]. The parties have fully briefed the simultaneous motions this Court requested. (Dkts. 83-87.)

**(c) Settlement Efforts.**

The parties have discussed settlement but do not believe it is possible at this stage.

**(d) Agreed Proposed Schedule (or Alternative Proposals) for the Next 45 Days:**

Given the parties' pending forum-related motions requested by this Court (Dkts. 84-85), the parties agree they will await the Court's ruling on those motions before submitting proposed schedules for other case events such as discovery and dispositive motions (and also will refrain from proceeding with any discovery).

**(e) Agreed Proposed, Revised Discovery and Dispositive Motion Schedule (or Alternative Proposals) Where the Current Schedule Needs Revision:**

Not applicable. There is no existing discovery and dispositive motion schedule.

**(f) Any Agreed Action that the Court Can Take without a Hearing:**

Not applicable, unless the Court would like the parties to address any questions relating to one or both of the pending forum-related motions (Dkts. 83-87).

**(g) Whether the Parties Believe a Telephonic Hearing with the Judge is Necessary and Time Urgent (and, If So, Identify the Issue that Warrants Discussion):**

The parties agree no telephonic hearing is necessary, unless the Court would like the parties to address any questions relating to one or both of the pending forum-related motions (Dkts. 83-87).

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Respectfully submitted this 16<sup>th</sup> Day of May 2020,

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| <p><i>/s/ Michael W. Ford</i><br/>Michael W. Ford, Esq.<br/><b>LAW OFFICES OF MICHAEL W. FORD</b><br/>(local counsel)<br/>IL Bar # 0846139<br/>4 Timberwood Lane<br/>Riverwoods, IL 60015<br/>Tel. 847.948.7884<br/>Email: mfordski@gmail.com</p> <p>-AND-</p> <p><i>/s/ Emil T. Bayko</i><br/>Emil T. Bayko<br/>IL Bar # 0141356<br/><b>PREBEG, FAUCETT &amp; ABBOTT, PLLC</b><br/>8441 Gulf Freeway, Suite 307<br/>Houston, TX 77017<br/>Tel. 832.742.9260<br/>Fax 832.742.9261<br/>Email: tbayko@pfalawfirm.com</p> <p><b>ATTORNEYS FOR PLAINTIFF</b><br/><b>PETER M. GALLIGAN</b></p> | <p><i>/s/ per email authority 5/15/20</i><br/>Brian Stolzenbach<br/><b>SEFARTH SHAW LLP</b><br/>233 S. Wacker Drive, Suite 8000<br/>Chicago, IL 60606-6448<br/>Tel. 312.460.5551<br/>Email: bstolzenbach@seyfarth.com<br/>mtroy@seyfarth.com<br/>thoran@seyfarth.com</p> <p><b>ATTORNEYS FOR DEFENDANTS</b><br/><b>ADTALEM GLOBAL EDUCATION, INC., F/K/A DEVRY EDUCATION GROUP, ET AL.</b></p> |
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document was served on all counsel of record in this matter, including those listed below, by filing it using the Court's CM/ECF system on today's date:

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DATED this 16<sup>th</sup> Day of May 2020.

/s/ Emil T. Bayko  
EMIL T. BAYKO